

Much of the reasoning behind RM-10784 seems rather unsound, especially that focused on reciprocal operation. While the petitioner seems to believe his proposal is a less complicated means to provide a fair compromise between those who wish to eliminate all Morse code requirements and those who wish to maintain a code requirement for the Amateur Extra class license, the end result licensing structure with little or no benefit to the Amateur Radio Service and little or no satisfaction for those favoring either side in the Morse code debate. The petitioner seems to believe that dropping the Element 1 requirement for the General class license is somehow an easier change to make to the current rules than dropping the Element 1 requirement altogether.

The petitioner presents no clear reason for maintaining a code requirement for the Amateur Extra Class other than tradition or sentiment. Clearly, there are some amateurs who have very strong feelings against 'no code Extras'. But is requiring even the most advanced amateur operators to understand Morse code actually useful in the promotion of the hobby or the performance of public service? The volunteer examiners, at their recent national convention, expressed support for the removal of the Morse code requirement because Element 1 testing is burdensome and produces no clear benefit to the Amateur Radio Service. The current Part 97 rules do not require testing of any other operating mode for a license in the Amateur Radio Service. Yet there are a number of other weak signal modes that allow operators to communicate globally under adverse band conditions. How is a demonstration of proficiency in Morse code more important or more desirable than proficiency in any other mode? If the Commission truly desires to have operators in the Amateur Radio Service demonstrate some proficiency in communication on the Amateur bands, then the Commission should require all those applying for an Amateur license to demonstrate their ability to use FM voice mode communications through a practical test rather than just through some questions on a written exam. Clearly, FM voice is the widely used mode of communication in the Amateur Radio Service. Yet the current rules require no practical demonstration of one's ability to use FM voice mode to gain privileges through the Technician class license.

I can see no convincing reason to maintain a Morse code requirement for any class of operator license in the Amateur Radio Service. The Commission should deny the changes proposed in this petition.